

ENCLOSURE

Reporting Forms and Directions for Submitting 2003 Data
Required for Consumer Products Containing Perchloroethylene and Methylene Chloride

Please read all the instructions prior to completing the reporting forms. If you have any questions, please do not hesitate to call Mr. Femi Olaluwoye, Air Pollution Specialist, at (916) 327-1503.

Pages 4-6 contain hypothetical examples and demonstrate how information should be entered into the reporting forms. These forms serve as examples and do not need to be submitted.

Please submit completed reporting forms no later than March 30, 2004, to:

California Air Resources Board
Stationary Source Division
Air Quality Measures Branch
P.O. Box 2815
Sacramento, California 95812
Attention: Mr. Femi Olaluwoye

Please complete the reporting forms for all consumer products (**excluding aerosol adhesives, automotive brake cleaners, carburetor and choke cleaners, and engine degreaser**) containing at least 1.0 percent perchloroethylene and/or methylene chloride that you sell in California. Please report all sales from the year 2003. The reporting forms consist of:

1. One Company Information Form
2. Perchloroethylene and Methylene Chloride Reporting Form
(Copy additional forms as necessary.)
3. One Confidential Information Submittal Form

Instructions for completing the Perchloroethylene and Methylene Chloride Reporting Forms

Please fill in the Company Information Form. However, if during 2003, you did not sell any consumer products containing perchlorethylene or methylene chloride in California, indicate this on the Company Information Form in the box provided. Mail this completed form to us at the above address.

It is important that you submit a label for each new product reported. You do not have to submit labels for previously reported products unless that label has changed since your last submission.

Instructions for completing the Perchloroethylene and Methylene Chloride Reporting Forms
(con't.)

1. **Item number and product name-** Please assign one number to each product. Number products consecutively. List the product name of each product exactly as it appears on the principal display panel of your product. Products based on the same formulation may be aggregated if the product formulation is identical except for the coloring;
2. **Product category-** Indicate product categories as listed in section 94509(a) of the Consumer Products Regulation.
3. **Product form-** Indicate product form, using "A" for aerosols, "P" for pump, "L" for liquid, "S" for solid, or "O" for other. If your product falls into the category of "others," briefly describe the dispensing form of this particular product (such as gel) under the comments section of the reporting form.
4. **Weight percent-** The weight of perchloroethylene, to the nearest 0.1 percent, as a percent of the net product weight, i.e. excluding container and packaging weight.

$$\text{percent by weight} = \frac{(X)}{(Y_p)} \times 100$$

where: X = weight of perchloroethylene in product, and

Y_p = net weight of product (including propellant
but excluding container and packaging)

5. **Weight percent-** The weight of methylene chloride, to the nearest 0.1 percent, as a percent of the net product weight, i.e. excluding container and packaging weight.

$$\text{percent by weight} = \frac{(X)}{(Y_p)} \times 100$$

where: X = weight of methylene chloride in product, and

Y_p = net weight of product (including propellant
but excluding container and packaging)

6. **Product sales in California-** Calculate the amount of product sold by multiplying the weight of each product unit (excluding container and packaging) by the number of units sold:

Product unit weight (in pounds) X units sold in CA per year = total amount sold in CA per year.

If sales data specific to California are not available, you may apportion your total sales based on the estimated proportion of your sales that occur in California. Use 2003 calendar year for the California sales.

If 2003 sales data are not available, you may use the most recent 12-month period available to you specifying the time period the sales are from. Report the amount sold in pounds. Please do not use fluid ounces.

Comments- Use for any additional information you would like to add for example to describe products that fall into the category of "others." Ensure the Item Number you assigned to the product in Block 1 is the same Item Number in the Comments section for each product.

COMPANY INFORMATION FORM

CALIFORNIA AIR RESOURCES BOARD

PERCHLOROETHYLENE AND METHYLENE CHLORIDE REPORTING FORMS

Please fill out the requested information about your company. Provide us with the complete company name and mailing address. Identify a contact person, specify this person's title, and provide his or her phone and FAX number. This sheet needs to be completed only once for each company and should be attached to the product information forms upon submittal.

Company name: Smith-Meyer
Address: 3030 Circle Drive
City, State, ZIP: Anytown, CA 92345
Contact person: Jane Doe
Title: Director of Research and Development
Phone: (123) 456-7890 FAX: None Available

SAMPLE

Email: _____

- ☐ NO PERCHLOROETHYLENE CONTAINING PRODUCTS SOLD IN CALIFORNIA IN 2003
☐ NO METHYLENE CHLORIDE CONTAINING PRODUCTS SOLD IN CALIFORNIA IN 2003

Total number of product labels included for your Company = 2

It is important that you submit a label for each new product reported. You do not have to submit labels for previously reported products unless that label has changed since your last submission.

Please ensure that each label includes legible usage instructions.

Confidential information?: X (yes) ____ (no)

SSD/AQMB 01 (Rev. 1/04)

For ARB Use Only	
Date received:	Log #:
ARB comments:	

CONFIDENTIAL

Perchloroethylene and Methylene Reporting Form for 2003 products

Company: Smith-Meyer

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(1) Item No. and Product Name	(2) Product Category	(3) Product Form: Aerosol (A) Pump (P) Liquid (L) Solid (S) Other (O)	(4) Percent by weight of Perchloroethylene (to nearest 0.1%)	(5) Percent by weight of Methylene Chloride (to nearest 0.1 %)	(5) Total California 2003 Product sales rounded to nearest pound
1 Everyday Adhesive	Contact Adhesive	L	70%		1500
2 Clean Away	Solvent Parts Cleaner	L		59.2%	20

SAMPLE

Item No. Comments:

SSD/AQMB 02 (Rev. 1/04)

CONFIDENTIAL INFORMATION SUBMITTAL FORM

(If you wish to designate any information contained in your reporting data as confidential, please provide the data requested below and return with your reporting forms.)

In accordance with Title 17, California Code of Regulations (CCR), Section 91000 to 91022, and the California Public Records Act (Government code Section 6250 et seq.), the information that a company provides to the Air Resources Board (ARB) may be released (1) to the public upon request, except trade secrets which are not emissions data or other information with is exempt from disclosure or the disclosure of which is prohibited by law, and (2) to the Federal Environmental Protection Agency (EPA), which protects trade secrets as provided in Section 114(c) of the Clean Air Act and amendments thereto (42 USC 7401 et seq.) and in federal regulation, and (3) to other public agencies provided that those agencies preserve the protections afforded information which is identified as a trade secret, or otherwise exempt from disclosure by law (Section 39660(e)).

Trade secrets as defined in Government Code Section 6254.7 are not public records and therefore will not be released to the public. However, the California Public Records Act provides that air pollution emission data are always public records, even if the data comes within the definition of trade secrets. On the other hand, the information used to calculate information is a trade secret.

If any company believes that any of the information it may provide is a trade secret or otherwise exempt from disclosure under any other provision of law, it must identify the confidential information as such at the time of submission to the ARB and must provide the name, address, and telephone number of the individual to be consulted if the ARB receives a request for disclosure or seeks to disclose the data claimed to be confidential. The ARB may ask the company to provide documentation of its claim of trade secret or exemption at a later date. Data identified as confidential will not be disclosed unless the ARB determines, in accordance with the above referenced regulations, that the data do not qualify for a legal exemption from disclosure. The regulations establish substantial safeguards before any such disclosure.

In accordance with the provisions of Title 17, California Code of Regulations, Section 91000 to 91022, and the California Public Records Act (Government Code Sections 6250 et seq.),

Company Name, Smith-Meyer
declares that all the information submitted in response to the California Air Resources Board's Perchloroethylene Reporting Requirements is confidential "trade secret" information, and request that it be protected as such from the public disclosure. All inquiries pertaining to the confidentiality of this information should be directed to the following person: SSD/AQMB 02A (Rev. 1/04)

Date: _____

(Signature) _____

(Printed Name) Ms. Jane Doe

(Title) Director, Research and Development

(Telephone Number) (123) 456-7890

Mailing Address: Ms. Jane Doe

Director, Research and Development

Smith-Meyer

3030 Circle Drive

Anytown, CA 92345

SAMPLE